

VIA ECFS

March 22, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: EX PARTE FILING – VRS Access Technology Reference Platform and RUE Profile

CG Docket No. 03-123 - In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; CG Docket No. 10-51 – Structure and Practices of the Video Relay Service Program

Dear Ms. Dortch:

Telecommunications for Deaf and Hard of Hearing, Inc., National Association of the Deaf, American Association of the DeafBlind, Deaf Seniors of America, Cerebral Palsy and Deaf Organization, Registry of Interpreters for the Deaf, Inc., Gallaudet University Alumni Association, Hearing Loss Association of America, American Deafness and Rehabilitation Association, Northern Virginia Resource Center for Deaf and Hard of Hearing Persons (the "Consumer Groups") and the Rehabilitation Engineering Research Center on Technology for the Deaf and Hard of Hearing at Gallaudet University ("RERC") submit this letter to clarify our stance on the VATRP, the RUE Specification, and the NANC IVC working group, further to our October 31, 2018 letter.

Consumer Groups and the RERC wish to reiterate in the strongest terms that the VATRP App and the RUE Specification should continue, once concerns about process and direction have been addressed. As we have maintained in several previous filings, these provide the only avenue through which key consumer and research stakeholder concerns could be addressed in an equitable manner. These concerns have been laid out in the collaborative effort between consumer groups and the TRS industry, which resulted in the filing of *Consumer Groups TRS Policy Statement* with the Commission in 2012.¹ The statement provided the FCC guidance and support with a definition, a list of principles, and several key planning goals for functional equivalency in Telecommunications Relay Services. The VATRP App and RUE specification hold great, but untapped promise toward fulfilling the goals in the Policy Statement.

Consumer Groups and the RERC wish to again point out that the current mechanisms for developing the VATRP App and the RUE specification do not yet meet the above-referenced promise. In particular, it is essential that the process follow inclusive design practices, further to the principle of "nothing about us without us." Since the termination of the ACE App, key stakeholders have been frozen out of the process, with minimal opportunities for input and steering the process. As a result, there has been an apparent mismatch between consumer priorities, features that have been deemed important in the RUE Specification by its

¹ See TRS Policy Statement – Functional Equivalency of Telecommunications Relay Services: Meeting the Mandate of the Americans with Disabilities Act at 2 (Apr. 12, 2011) (emphasis added) ("*TRS Policy Statement*"), available at: <https://ecfsapi.fcc.gov/file/7021748016.pdf>

developers, and features that have been deemed important by the providers, as per their October 17, 2018 letter.

To reiterate some specific examples of the mismatch, call security and encryption are a top priority for Consumer Groups and the RERC, and we agree with the approach taken in the RUE Specification. Concurrent registration was highlighted as a key feature in an ex parte filing by Columbia University on March 19, 2019, whereas Consumer Groups and the RERC considered it a lower priority feature that should be evaluated on a case by case basis and proposed as more critical the issues of 9-1-1 geolocation and address book portability. NG9-1-1 compatibility is another key area, and Consumer Groups and the RERC believe that the VATRP will serve as an important tool for interoperability testing against the NENA i3 Solution.² In fact, a presentation on this topic and the i3 compliance of ACE/VATRP was given at the NENA 2016 Conference.³

Consumer Groups and the RERC wish to reiterate that the VATRP App and RUE Specification need to take place under an appropriate **inclusive** body of governance. In our October 31, 2018 filing, we suggested several standards organizations, together with rulemakings and DAC as possible venues. In light of the practical challenges associated with split governance, Consumer Groups and the RERC would like to make the following proposal:

Consumer Groups and the RERC propose that governance for the VATRP App and the RUE be put under a consortium whose idea was first raised by the FCC in August 2016, and for which considerable planning and dialogue has ensued. Gallaudet University, which hosts the RERC, along with its sister Consumer Groups and other academic institutions have already developed proposed plans for its governance, following inclusive design principles. They stand ready to assist the FCC, providers, and standards bodies in the transition, and coordinate with the North American Numbering Council (NANC) Interoperable Video Calling (IVC) working group recommendations. Collaborative approaches have been successful in the past with wireless HAC⁴. Analogously, Consumer Groups and the RERC believe that a collaborative consortium constitutes the best approach for equitable representation of all stakeholder concerns, ensure that the FCC can initiate consensus-based rulemakings, and above all ensure that the VATRP App and RUE Specification are finally able to meet its promise.

² See NENA-STA-010.2-2016, Revised 9/10/2016.

³ Vogler, C., Williams, N., Hayes, P. Bridging Relay & NG9-1-1 via Open Source and Standards. NENA 2016 Conference, June 13, 2016.
<http://www.nxtbook.com/naylor/NENG/NENG0016/index.php?startid=7#/26>

⁴ Consumers and industry collaborated to develop consensus on proposed rules and timelines for implementation for wireless HAC. See e.g. *In the matter of Improvements to Benchmarks and Related Requirements Governing Hearing Aid-Compatible Mobile Handsets*, WT Docket No. 15-285, Report and Order (August 4, 2016) at ¶17-19. While the HAC approach was not a consortium, the VATRP App and RUE Specification are a bigger topic than wireless HAC and consequently require one to provide the necessary structure.

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Please feel free to contact the undersigned if you have any questions.

Respectfully submitted,

/s/

Claude L. Stout
Executive Director
Telecommunications for the Deaf and Hard of
Hearing, Inc.
P.O. Box 8009
Silver Spring, MD 20907
cstout@tdiforaccess.org

Howard Rosenblum, Chief Executive Officer
Zainab Alkebsi, Policy Counsel
National Association of the Deaf (NAD)
8630 Fenton Street, Suite 820
Silver Spring, MD 20910
howard.rosenblum@nad.org
zainab.alkebsi@nad.org

René G. Pellerin, President
American Association of the DeafBlind
65 Lakeview Terrace
Waterbury Center, VT 05677
info@renetheunstoppable.com

Nancy B. Rarus, President
Deaf Seniors of America
403 Greear Place
Herndon, VA 20170
nbrarus@gmail.com

Mark Hill, President
Cerebral Palsy and Deaf Organization
12025 SE Pine Street #302
Portland, Oregon 97216
(503)512-5066
www.cpado.org

Melvin A. Walker
President RID Board of Directors
Neal P. Tucker,
Director of Member Services & Government
Affairs
Registry of Interpreters for the Deaf, Inc.
(RID)
333 Commerce Street, Alexandria, VA 22314
703.838.0030
President@RID.org
NTucker@RID.org

Dr. Donald Ammons, President
Gallaudet University Alumni Association
Gallaudet University
Peikoff Alumni House
800 Florida Avenue NE
Washington, D.C. 20002

Barbara Kelley, Executive Director
Hearing Loss Association of America
7910 Woodmont Avenue, Suite 1200
Bethesda, MD 20814
BKelley@hearingloss.org

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John Gournaris, Ph.D., President
American Deafness and Rehabilitation
Association (ADARA)
john.gournaris@adara.org
1204 Queen St. NE, Washington DC 20002
www.adara.org

Robert H. Loftur-Thun, Interim Executive
Director
Northern Virginia Resource Center for Deaf
and Hard of Hearing Persons
3951 Pender Drive, Suite 130
Fairfax, VA 22030
703-352-9055 Voice
www.nvrc.org

Christian Vogler, Ph.D., Director
Rehabilitation Engineering Research Center
on Technology for the Deaf and Hard of
Hearing
Gallaudet University
800 Florida Avenue NE, TAP – SLCC 1116
Washington, DC 20002
christian.vogler@gallaudet.edu

cc (via email): Eliot Greenwald, DRO
David Schmidt, OMD